AO 106 (Rev. 04/10) Application for a Search Warrant

FILED

APR 29 2015

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

for the

Southern District of California

In the Matter of the Search of
(Briefly describe the property to be searched or identify the person by name and address)

Data obtained from Yahoo, Inc., associated with email address ceo@electionmall.com, currently in the possession of FBI

Case No. 15MJ1341

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Please see Attachment A

located in the Southern District of California, there is now concealed *(identify the person or describe the property to be seized)*:

Please see Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

☑ evidence of a crime;

☐ contraband, fruits of crime, or other items illegally possessed;

☐ property designed for use, intended for use, or used in committing a crime;

☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	*Offense Description*
18 U.S.C. secs. 371, 1519; 2 U.S.C. secs. 437g, 441e	conspiracy; falsification of records; campaign donation or contribution by a foreign national aggregating $25,000 or more

The application is based on these facts:
Please see attached Affidavit

☑ Continued on the attached sheet.

☐ Delayed notice of ____ days (give exact ending date if more than 30 days: ________) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[signature]
Applicant's signature

FBI SA Erin Phan
Printed name and title

Sworn to before me and signed in my presence.

Date: 4/29/2015

[signature]
Judge's signature

City and state: San Diego, California

The Honorable Ruben B. Brooks, US Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR SEARCH WARRANT

I, Erin Phan, being duly sworn, hereby depose and state as follows:

1. I have been employed as a special agent with the Federal Bureau of Investigation ("FBI") since January 2004. I am currently assigned to the public corruption squad in the San Diego Division. Prior to joining the FBI, I attended the University of Virginia, where I received a Bachelor of Science degree in business with a concentration in accounting, as well as a Master of Science degree in accounting. Following graduation, I passed the Certified Public Accountant examination and became a licensed Certified Public Accountant. For three years prior to becoming an FBI special agent, I was employed by an international accounting firm as an Assistant Accountant, Senior Accountant and, ultimately, a Supervising Senior Accountant. While at that firm, I oversaw the financial statement audits of public, private and government entities.

2. As a special agent, I received basic federal law enforcement training at the FBI Academy in Quantico, Virginia. My training at the FBI Academy included instruction on how to conduct searches consistent with the Fourth Amendment, the drafting of search warrant affidavits and the probable cause standard. During my career as a special agent, I have investigated numerous white collar crimes, including mail fraud, wire fraud, money laundering, financial institutions fraud, government program fraud and public corruption. Through these investigations, I have had occasion to conduct various types of searches, including the search of homes, offices and electronic media. In addition to conducting such searches, I have employed many other investigative techniques, including the interview of subjects, witnesses and confidential informants, as well as physical and electronic surveillance and the use of undercover agents. Furthermore, as a special agent and CPA, I have experience in

analyzing bank records, bank reports, accounting records, business records, emails and other electronic data.

3. As a CPA and a member of the public corruption squad, I have come to understand various techniques employed by those who engage in criminal activity. For example, I have become familiar with how individuals make corrupt payments to public officials, as well as the steps they take to conceal those payments. Similarly, I have become familiar with how individuals may use shell corporations to obscure the origin of funds and conceal the true owner of assets.

4. This affidavit is in support of an application by the United States of America for a warrant to search data described in Attachment A. This data (the "**subject data**") is currently in the physical possession of law enforcement, having been obtained from Yahoo, Inc. ("Yahoo"), pursuant to a previous warrant relating to the following email account:

ceo@electionmall.com

This affidavit seeks authorization to search the **subject data** for communications described in Attachment B (the "**subject communications**"), such communications constituting evidence of violations of federal criminal law, namely, 18 U.S.C. § 371 (conspiracy to commit offenses against the United States), and § 1519 (Falsification of Records), and 2 U.S.C. §§ 437g(d)(1)(A) and 441e(a)(1)(A) (campaign donation or contribution by a foreign national aggregating $25,000 or more).

5. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation; my review of documents and computer records related to this investigation; communications with others who have personal knowledge of events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth

each and every fact that I or others have learned during the course of this investigation.

PRIOR SEARCH WARRANT

6. On December 16, 2014, the Honorable Bernard G. Skomal, U.S. Magistrate Judge, signed a search warrant to obtain certain data from Yahoo related to the email address **ceo@electionmall.com**. The search warrant and application were filed with the Court under seal, and were assigned docket number 14-MJ-4202.

7. As described in my affidavit accompanying that search warrant application, the FBI is conducting a continuing investigation into campaign finance offenses committed in connection with San Diego elections by (among others) a Mexican businessman, Jose Susumo Azano Matsura ("Azano"), and Ravneet Singh ("Singh"), the owner of a company called ElectionMall, Inc. ("ElectionMall"). (This investigation, and the pending charges against Azano, Singh, and ElectionMall, are discussed further below in this affidavit.) The email address **ceo@electionmall.com** was used by Singh, ElectionMall's CEO and owner, in connection with the offenses.

8. After serving the warrant, FBI received the electronic data from Yahoo on January 26, 2015. (This electronic data constitutes the **subject data**, currently in the physical possession of law enforcement, that this affidavit seeks permission to search for additional information.) Law enforcement then proceeded to analyze that data, pursuant to the "Procedures for Electronically Stored Information" contained in the warrant affidavit. The purpose of that review has been to identify material responsive to Attachment B of that warrant.

9. In the course of reviewing the **subject data**, FBI has discovered certain categories of information that are not explicitly described in Attachment B to that warrant, but are nonetheless probative evidence in the investigation. This application seeks authorization to re-search the **subject data** and seize those categories of information, the **subject communications**. Although law enforcement could arguably seize the **subject communications** under a theory of plain view, the United States

seeks judicial approval in this warrant to seize those communications based on a finding of probable cause.

10 Specifically, this warrant seeks authorization to seize communications (as described in Attachment B to this application) from January 1, 2011 to January 31, 2014, involving, relating to, or evidencing:

a. Services rendered, offered, or to be offered by Ravneet Singh, ElectionMall, eSolutions R&D, or any other company or agent of Singh to Jose Susumo Azano Matsura, Broadlink S.A. de C.V., or any other company or agent of Azano;

b. Data reflecting the income, assets, or ownership of ElectionMall or any other company owned wholly or in part by Singh; and

c. Pricing for election-related services rendered, offered, to be offered by Ravneet Singh, ElectionMall, or any other company or agent of Singh;

which are evidence of violations of 18 U.S.C. §§ 371, or 1519, or 2 U.S.C. §§ 437(d)(1)(A) or 441e(a)(1)(A).

11. I have probable cause to believe that these categories of information are to be found in the **subject data**, because I have seen such communications in the course of my review pursuant to the earlier search warrant. The relevance of these categories of information is as follows:

a. *Services Singh performed for Azano beyond San Diego-based elections*. Based on my review of the **subject data**, it appears that Singh performed extensive work for Azano, potentially beyond the work done in connection with the Dumanis and Filner campaigns. In an internal ElectionMall email dated June 1, 2012, an ElectionMall employee sends Singh a list of ElectionMall's billings to Azano (who is sometimes referred to in the emails by the code name "Kaliman"[1]). This email reflects over $700,000 in billings by ElectionMall to Azano in the five-month period from January 1, 2012 to June 1, 2012. The email also reflects that, as of June 1, 2012, almost $400,000 of the amount billed had already been paid. These totals are far greater than the expenditure amounts referenced in the Indictment in connection with Singh's services. To the extent that these invoices relate to services rendered in connection with San Diego-based elections, they would be in furtherance of the conspiracy charged in the indictment. To the extent that these invoices relate instead to other projects, they are relevant to establish the financial connection and course of dealing between charged co-conspirators in this case. They may also reflect efforts by Azano to use Singh to influence elections outside the United States. For example, another email to Singh dated July 5, 2013 refers to a project for "Mr. A" that is to take place in Brazil. If Azano has hired Singh to influence elections in other countries outside of Azano's home country of Mexico, it would be highly relevant to his knowledge, intent, methodology, and motive for seeking to clandestinely influence elections in the United States.

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[1] An internal ElectionMall email instructs that the name on an invoice "should NOT be Kaliman's name," and instead gives the business name of Broadlink, S.A. de C.V., one of Azano's companies. According to Wikipedia, "Kaliman" is the name of

b. *ElectionMall's financial information.* The **subject data** includes financial data that reflect revenue from Azano and other sources. An email to Singh dated December 30, 2012 provides a year-end profit and loss statement for ElectionMall, which categorizes income according to various ElectionMall business functions (such as "Build," "Manage," and "Raise"). There is a separate line item in the statement for revenue from "Kaliman" (Azano) – and the income from this source is so significant that, for the first quarter of 2012, it exceeds the income line item associated with any other business function or client. This financial information is relevant to establishing Singh's powerful motive in furnishing lucrative, illegal services for his code-named client. Additionally, in recent months I have participated in interviews with three former members of the ElectionMall's board of directors,

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a Mexican comic book superhero of mysterious origins who has adventures in exotic locales.

each of whom denied having ever been informed by Singh that Azano was a client. Singh's failure to report to his own board of directors the identity of a foreign national client who contributed so significantly to the company's financial performance is relevant to Singh's knowledge that these services were illicit.

c. *ElectionMall's pricing*. The **subject data** also includes internal pricing data for ElectionMall. This information is relevant to establishing the types of services that Singh offered or performed for Azano; it is also relevant to interpolating, from Singh's invoices to Azano, the scope of the work performed.

12. Accordingly, I seek authorization to seize the **subject communications**.

STATEMENT OF PROBABLE CAUSE[2]

13. The FBI is investigating Jose Susumo Azano Matsura, Ravneet "Ravi" Singh, and others for, among other things, conspiracy to make illegal campaign contributions and donations and to falsify campaign finance records. Based on the facts contained within this Affidavit, I respectfully submit there is probable cause to believe that evidence of violations of 18 U.S.C. §§ 371 1519, and 2 U.S.C. § 437g(d)(1)(A) and 441e(a)(1)(A), will be found within the subject account.

Summary of Certain Individuals Relevant to the Affidavit

14. Azano is a businessman who maintains residences in Coronado, California. According to immigration records, Azano is a citizen of Mexico and is neither a citizen of the United States nor a legal permanent resident. Instead, Azano has held a type of visa that allows him to travel and conduct business within the United States.

15. Ernesto Encinas was the manager of Azano's security detail. Encinas is a former San Diego Police Department (SDPD) detective who, while employed by the SDPD, worked for some time in the Vice Operations Unit. In addition to working for Azano, Encinas was the owner of Coastline Protection and Investigations, Inc.

[2] This discussion of probable cause is substantially similar to the discussion in my affidavit in support of the earlier search warrant to Yahoo, 14-MJ-4202.

("Coastline PI"), a company specializing in security and consulting services for downtown San Diego clubs and restaurants. In October 2013, I helped recruit Encinas as a confidential informant. Subsequently, Encinas recorded his conversations with various former coconspirators, including Azano and Singh. On March 18, 2014, Encinas pled guilty in Criminal Case 14-CR-0344-MMA to: conspiracy to violate 2 U.S.C. §§ 437g(d)(1)(A)(i), 441e, 441f, and 18 U.S.C. § 1519, all in violation of 18 U.S.C. § 371; and making a false statement on a tax return, in violation of 26 U.S.C. § 7206(1).

16. According to public and open source records, Ravneet ("Ravi") Singh was the founder, President and CEO of ElectionMall, Inc. According to these same sources, as well as witnesses with whom I have spoken, ElectionMall provided technological support, including social media and advertisement-related spending, to political campaigns throughout the world.

17. Marco Polo Cortes ("Cortes") is a lobbyist. According to public filings made by Cortes, he has lobbied SDPD officials, city councilmembers, members of council staff, former San Diego mayor Robert Filner, and members of Filner's staff, for conditional use permits and similar licenses.

The Indictment

18. On August 12, 2014, a federal grand jury in the Southern District of California returned a superseding indictment, in Criminal Case 14cr0388-MMA, charging Azano (aka Mr. A, aka Mr. Lambo), Singh, ElectionMall, and Cortes with conspiracy, campaign finance offenses and other crimes. More specifically, in relevant part, the superseding indictment charges Azano, Singh, ElectionMall, and Cortes with conspiring to make campaign donations and contributions by a foreign national aggregating $25,000 and more in a calendar year, in violation of 2 U.S.C. §§ 437g(d)(1)(A) and 441e(a)(1)(A), and to falsify campaign finance records in violation of 18 U.S.C. § 1519, all in violation of 18 U.S.C. § 371. The superseding indictment

charges the same defendants with substantive violation of 2 U.S.C. § 437g(d)(1)(A) and 441e(a)(1)(A), and with various substantive violations of 18 U.S.C. § 1519.

19. In summary, the indictment alleges, among many other things, that:

a. In or about 2011, Azano, a foreign national prohibited under Title 2 from making donations and contributions (directly or indirectly) in support of any candidate for elective office in the United States at the federal, state or local level, began to involve himself in San Diego politics and subsequently made large donations in support of candidates for elective office in San Diego.

b. Azano conspired with Encinas, Cortes, Singh and ElectionMall to design secretive methods for Azano to finance candidates' campaigns in violation of the prohibitions against contributions and donations by foreign nationals. For example, Azano and Singh arranged unreported in-kind contributions in support of: (1) "Candidate 1" [Bonnie Dumanis], a candidate for Mayor of San Diego during the 2012 primary election cycle; and (2) "Candidate 3" [Robert Filner], a candidate for Mayor of San Diego during the 2012 primary and general election cycles. The in-kind contributions included social media services provided by ElectionMall and Singh, but paid for by Azano.

20. Azano, Singh, Cortes and ElectionMall have all entered "not guilty" pleas. The trial date has not yet been set.

Unreported In-Kind Contributions to the Dumanis Campaign

21. I have reviewed copies of emails provided by counsel for Bonnie Dumanis. On December 25, 2011, Ms. Dumanis sent an email to certain members of her 2012 mayoral campaign stating, in part:

> So, I got a call, conference call, from Ernie Encinas, Susumo Azano and Ravi Singh. Ernie has been helping lots with fundraising and introduced Kelli and me to Mr Azano, a client of his security firm. He is very wealthy. He is helping to raise money from his family and friends. He has a relationship with Razi [sic] and wanted me to talk to him because he is a master of Internet campaign stuff.

Later in the same email, referring to Singh, Ms. Dumanis stated: "It is unclear whether he wants to do some volunteer advising or some form of paid work. I told him about our budget issues. He has done major campaign work nationally and internationally." Ms. Dumanis also stated that Singh "apparently flew to SD just to talk with Mr A who wanted him to talk to me!"

22. According to a search of Azano's email account, sazano42@gmail.com, which was authorized by the Honorable Barbara L. Major, there is probable cause to believe that Azano, in fact, helped illegally purchase ElectionMall services and political advertisements supporting Dumanis's campaign. For example, on February 26, 2012, Maria Alejandra Aguilar ("Aguilar"), whose signature block identified her as ElectionMall's "Director of Executive Affairs for Latin America," sent an email to cesarcazaresm@gmail.com, with sazano42@gmail.com and "Ravi" at ceo@electionmall.com in the "cc" line. In the email, Aguilar wrote:

> Dear Cesar, Attached you will find the invoices[.] The second invoice is for Bonnie[.] By BBM [BlackBerry Messenger communication], Mr[.] Lambo indicated to Mr[.] Singh that the 125 will be paid by Friday and the remaining 75 will be paid this week. Additionally[,] there is a 28.000 google buy [sic] that is also pending. If you could please make sure [these] payments are taken care of[,] I would greatly appreciate it. . . . PS I am ccing Mr[.] Lamborghini to help speed up the process[.]

23. Aguilar attached two invoices, each of which appeared to be issued by "eSolutions R&D Lab, LLC" at 1101 Pennsylvania Ave. NW, Suite 600, Washington, D.C. 20004, to "Broadlink, S.A. de C.V.," in Jalisco, Mexico, which agents, drawing on bank records, emails and open source records, believe to be a company owned by Azano. The first invoice, for $125,000, purported to be for a "[m]onthly license for associated development software with monthly maintenance . . . ." The second invoice, for $75,000, appeared to be for the Dumanis campaign to "PROMOTE: Online Outreach**Any of the following: Display Ads, Banner Ads, Text Ads, Key Ad

Word Placement" [sic]. Based on the context of this email and my interviews of Encinas, I believe "Mr[.] Lambo" and "Mr[.] Lamborghini" to be references to Azano.

24. About one month later, on March 13, 2012, Aguilar sent another email, including sazano42@gmail.com as a recipient:

> Dear Ceasar, . . . Enclosed is the invoice for the betty boo [sic] project for 100k it was originally 75[,] but Mr[.] Singh explained the need for the additional 25 during his last visit to San Diego and Mr A verbally agreed[.] The second invoice is for 28k for google key ad word buy that was placed a month ago. Mr[.] Singh [BlackBerry Messengered] Mr A this week and he indicated that the transfer could be made . . . .

25. Aguilar attached two invoices – each of which, again, were from "eSolutionsR&D Lab, LLC" to "Broadlink, S.A. de C.V." The first of these, for $28,000, purported to be for "Google key ad words advertising, design charges, media buys, and placement charge." The second invoice was substantively identical to the "PROMOTE: Online Outreach**" invoice identified above, but in the amount of $100,000 rather than $75,000. In a response sent that same day, Azano refused to pay the additional $25,000, writing "No more money that wasn't the agmt with Ravi [Singh] we will only transfer what I told him" [sic]. On April 13, 2012, according to bank records, Broadlink S.A. de C.V. wired $174,979 to a bank account belonging to ElectionMall.

26. On June 13, 2012, Encinas sent an email to Singh at ceo@electionmall.com, advising that Azano was annoyed with Singh for not setting up a political action committee:

> Hi Ravi, I talked to him the other day and without going into too much detail he was upset about the money he said he sent you to form a PAC and do the social media. He said since no PAC was formed he wants that money back. . . .

Singh replied: "I am not responding to this email. Because of the legal ramifications. Please talk to me . . . in person." Based on my experience and my discussions with other agents, I believe that Singh was chastising Encinas for his lack of discretion in communicating about illegal activity over email.

27. Indeed, in 14cr-344-MMA, Encinas affirmed in the factual basis of his plea agreement that he, Azano, Singh, and Cortes agreed to knowingly and willfully make foreign national contributions aggregating $25,000 and more in a calendar year, and that Azano, Singh and others agreed that Azano would fund social media services in favor of "Candidate 1" [Dumanis].

28. Based on the superseding indictment in Criminal Case 14cr0388-MMA, information set forth above, and evidence set forth below that Singh and Azano collaborated in a similar financing scheme for Filner, there is probable cause to conclude that Azano, Singh and others conspired to provide paid social media services and ad "buys" for the benefit of the Dumanis campaign, in violation of federal law. By effectively donating a paid service, rather than money, to the Dumanis campaign, Azano and Singh accomplished what is oftentimes referred to as an "in-kind contribution." After searching public records, other agents and I conclude that these in-kind contributions were not reported in any public filings by any campaign, committee or other entity.

Unreported In-Kind Contributions to the Filner Campaign

29. Filner's former campaign manager, Edward Clancy, has provided information to the investigative team. According to Clancy, he met Encinas and Cortes out in the community at some point during the 2012 general election cycle, but no later than October 2012, about three and-a-half weeks before Election Day. Shortly after that initial meeting, Encinas and Cortes walked into Filner's campaign offices and asked to speak to Clancy, explaining that they had already spoken to Filner and that they wanted to help the campaign. The next day, when Clancy arrived at the campaign office, Singh and his associates had already set up their equipment. Encinas and Cortes introduced Singh and his "right-hand computer guy, Miguel," and offered to handle social media efforts, such as boosting Facebook "likes" and online branding.

Clancy pressed for a price quote, but Singh demurred, saying that it would be $20,000 or $30,000, but that it would be "taken care of." Singh hinted that the campaign might be invoiced for "some" services. According to Clancy's interpretation, Singh was proposing to perform services without reporting them on a Form 460, a filing lodged with the Office of the City Clerk, City of San Diego.

30. According to Clancy, Singh was effective at harnessing social media in favor of the campaign. At one point, Singh showed Clancy charts of how Filner's Facebook "likes" had grown exponentially, and described how he (Singh) had succeeded in burying news about other candidates amidst positive media coverage of Filner online. Singh also helped create images and illustrations for Filner's brand – for instance, the digital image of a spinning globe to accompany President Bill Clinton's recorded endorsement of Filner.

31. During a recorded call with Encinas in November 2013, Singh claimed that the in-kind contributions done in connection with Filner's election were "legit" because they were done "through the campaign." But according to Clancy and public records, the Filner campaign did not pay Singh for his work. Nor did the Filner campaign list Singh's work as an in-kind contribution on any of its public filings. Nor did any independent expenditure committee report Singh's work as a contribution in support of the Filner campaign.

32. Nevertheless, bank records tend to confirm that Singh's expenses were, in fact, "taken care of." On October 15, 2012, Broadlink, S.A. de C.V. wired $96,980 to ElectionMall. Two weeks later, on October 29, 2012, Broadlink, S.A. de C.V. wired an additional $94,975 to ElectionMall. As described above, Broadlink was the same company used to pay ElectionMall's Dumanis-campaign-related invoices.

33. In the factual basis of his plea agreement in 14-CR-344-MMA, Encinas affirmed that Azano's efforts to finance the social media efforts favoring "Candidate 3" [Filner] were kept secret – unreported in the filings of any campaign or committee.

34. I have interviewed Megan Standefer, who performed work for ElectionMall on the Filner project. She consented to the FBI's search of her Gmail account, which provided further evidence that ceo@electionmall.com was used in connection with ElectionMall's work supporting the Filner campaign. For example, on October 31, 2012, Clancy sent an email to ceo@electionmall.com, miguel@electionmall.com and Standefer's Gmail address with the subject "clinton photo and text." The attachment contained a statement of Bill Clinton's endorsement of Filner, along with a photograph of Bill Clinton shaking Filner's hand. On November 1, 2012, Clancy sent another message to the same three email accounts stating, in part, "still would like to get clinton endorsement out."

GENUINE RISKS OF DESTRUCTION OF EVIDENCE

35. Because the **subject data** is in the physical possession of FBI, there is no genuine risk of destruction of evidence.

PRIOR ATTEMPTS TO OBTAIN THIS EVIDENCE

36. Although there was a previous search warrant issued for the **subject data**, the Attachment B to that warrant did not specifically seek authorization to seize the **subject communications** that are the subject of this application.

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PROCEDURES FOR ELECTRONICALLY STORED INFORMATION

37. Again, the subject data is in the physical possession of FBI. I request authorization for federal agents and/or investigative support personnel to review (again) the **subject data** and identify the **subject communications**. Law enforcement will then segregate the **subject communications** from the remainder of data by, for example, running a new report or query, transferring the **subject communications** into a new document or report, or redacting the material that is not subject to this warrant. Law enforcement will complete these tasks within thirty (30) days of the issuance of this warrant, absent an extension by the Court.

Efrin C. Phan
Special Agent
FBI

Subscribed and sworn to before me this 29th day of 2015.

HONORABLE RUBEN B. BROOKS
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

ITEMS TO BE SEARCHED

Data obtained from Yahoo, Inc. pursuant to search warrant 14-MJ-4202, associated with email address ceo@electionmall.com. This data is currently in the possession of FBI San Diego.

ATTACHMENT B

ITEMS TO BE SEIZED

Law enforcement shall conduct any search of the data pursuant to the "Procedures For Electronically Stored Information" of the affidavit submitted in support of this search warrant.

Law enforcement shall seize data only if it involves, relates to, or evidences, from January 1, 2011 to January 31, 2014:

a. Services rendered, offered, or to be offered by Ravneet Singh, ElectionMall, eSolutions R&D, or any other company or agent of Singh to Jose Susumo Azano Matsura, Broadlink S.A. de C.V., or any other company or agent of Azano;

b. Data reflecting the income, assets, or ownership of ElectionMall or any other company owned wholly or in part by Singh; or

c. Pricing for election-related services rendered, offered, to be offered by Ravneet Singh, ElectionMall, or any other company or agent of Singh;

And which constitutes evidence of violations of federal criminal law, namely, 18 U.S.C. §§ 371, or 1519, or 2 U.S.C. §§ 437(d)(1)(A) or 441e(a)(1)(A).